

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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FEMHEALTH USA, INC., d/b/a CARAFEM,

Plaintiff,

v.

CAUSE NO. 3:22-cv-00565  
JUDGE CAMPBELL

RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS; EDMEE  
CHAVANNES; OPERATION SAVE AMERICA;  
JASON STORMS; CHESTER GALLAGHER;  
MATTHEW BROCK; COLEMAN BOYD;  
FRANK “BO” LINAM; BRENT BUCKLEY; and  
AJ HURLEY,

Defendants.  
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**OSA DEFENDANTS’ PETITION TO DISMISS PLAINTIFF’S COMPLAINT OR, IN  
THE ALTERNATIVE, MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

Defendants Operation Save America, Jason Storms, Matthew Brock, Coleman Boyd, Frank “Bo” Linam, and Brent Buckley (“OSA Defendants” or “these Defendants”), by and through counsel, move this Court for entry of an order dismissing Plaintiff’s Amended Complaint, with prejudice, pursuant to Tenn. Code Ann. § 20-17-104, on the grounds that: (1) These Defendants have made a *prima facie* showing that Plaintiff’s claims were filed in response to these Defendants’ exercise of their rights of free speech and free press, their rights to petition, and their rights of association, and (2) Plaintiff cannot establish a *prima facie* case for each essential element of its claims. Alternatively, the OSA Defendants move the Court to dismiss Plaintiff’s claims pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief may be granted.

The grounds for this motion are more fully set forth in the memorandum of law in support of the motion, filed simultaneously herewith.

Dated: September 22, 2022

Respectfully submitted,

/s/Stephen M. Crampton

Stephen M. Crampton

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*Counsel for Defendants Operation Save America,  
Jason Storms, Matthew Brock, Coleman Boyd, Frank  
"Bo" Linam, and Brent Buckely*

## CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2022, the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, and that a copy of the foregoing will be sent electronically to all counsel of record by operation of the Court's CM/ECF system.

In addition, a true and correct copy of the foregoing will be served as follows:

**Via U.S. Mail**

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s/Stephen M. Crampton  
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